

OMQ Law ■ 401 Bay Street, 16<sup>th</sup> Floor ■ Toronto, ON M4H 2Y4  
416 834 5537 ■ david.moon@omqlaw.ca



March 4, 2026

**By Email**

**Jared Clarke, MLA**

Regina Walsh Acres  
Legislative Assembly of Saskatchewan  
[reginawalshacres@ndpcaucus.sk.ca](mailto:reginawalshacres@ndpcaucus.sk.ca)

Mr. Clarke,

I represent Lakeview Regional Wellness Centre Inc. dba Dr. Goodenowe Restorative Health Centre (the “Centre”), a wellness centre, and its director Dr. Dayan Goodenowe in Moose Jaw. I am writing regarding several public statements you made between December 1–3, 2025, including on Facebook, in media interviews, and through the public release of your December 2 letter to the Moose Jaw Police Service.

We note your statements were premised on and/or repeated content appearing in the CBC article of November 30, 2025. On August 15, 2025, my client publicly announced defamation proceedings against the CBC relating to its reporting regarding my client and the Centre on June 30, 2025. The concerns regarding the veracity and journalistic integrity of Geoff Leo and the CBC raised in that litigation were publicly available at the time of your statements. Despite this, there is no indication that you undertook any independent verification or review of the underlying facts before repeating and amplifying the serious allegations presented in the November 30, 2025 article.

Across various platforms, you asserted or implied that Dr. Goodenowe and his Centre engaged in fraud, criminal neglect, failure to provide the necessities of life, and criminal negligence, and that their conduct contributed to the death of a former client, Ms. Susie Silvestri. You also invoked multiple provisions of the Criminal Code of Canada in connection with Dr. Goodenowe personally and stated that you “fear for the safety of other patients.”

To be clear, statements made by you outside the Legislative Assembly — including your public Facebook posts, the public release of your December 2 letter, and your media interviews — are not protected by parliamentary privilege.

These are extremely serious allegations. They were presented as fact, widely circulated, and have caused significant reputational and financial harm to my clients.

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Furthermore, on December 3, 2025, my client publicly rebutted the false reporting by the CBC. The available medical information does not support the suggestion that Dr. Goodenowe or the Centre withheld necessities, acted with disregard for client safety, or contributed to Ms. Silvestri's death. Her condition worsened only after her contract had ended and she left the Centre. She underwent a medical procedure in the USA – a medical procedure that she was advised against and was deemed unnecessary by medical staff at the Wigmore Regional Hospital in Moose Jaw. Your statements did not accurately reflect the facts or the context surrounding the unfortunate and tragic death of Susie Silvestri after her contract with the Centre had ended. As a result the public narrative has been both inaccurate and harmful to my client.

Despite having ample time and opportunity, you have failed to issue corrections to your statements, remove false and unsubstantiated accusations, or issue an apology to my client. All of which would be in the public interest.

We hereby demand that you:

1. Immediately remove all posts and materials containing these allegations from your public platforms, including but not limited to Facebook, and any media statements or press releases.
2. Issue a public correction and retraction on the same platforms where the original statements were made, acknowledging that the allegations of criminal conduct against Dr. Goodenowe and the Centre were inaccurate, unfounded, and based on incomplete information.
3. Refrain from further statements suggesting that Dr. Goodenowe or the Centre engaged in criminal wrongdoing.
4. Preserve and refrain from destroying any documents or electronic records relating to your statements about Dr. Goodenowe and the Centre, including drafts, notes, correspondence, research, social-media analytics, and communications with media organizations.

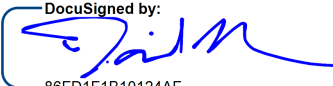
My client has instructed me, in conjunction with litigation counsel, to prepare to file formal legal action against you and all related parties by no later than March 20, 2026. Please confirm your intentions in writing within 14 days of the date of this letter. If this matter cannot be resolved informally to our satisfaction, my clients reserve the right to pursue all available legal remedies, including but not limited to commencing a defamation action against you or adding you as an additional defendant to existing proceedings, and seeking damages, injunctive relief, and costs.

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This letter is sent without prejudice to my clients' rights and remedies, in the hope that this matter can be resolved promptly and professionally without the need for litigation.

Sincerely,

DocuSigned by:  
  
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**David Moon**

Attorney-at-Law

OMQ Law

david.moon@omqlaw.ca

Counsel for Dr. Dayan Goodenowe and the Lakeview Regional Wellness Centre Inc.

cc: Saskatchewan New Democratic Party